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*Attorneys for Defendants Carol Nelson and
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**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,
Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON, individually and as joint tenant,
and STANLEY NELSON, individually and as joint
tenant,

Defendants.

Adv. Pro No. 10-04377 (SMB)

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

CAROL NELSON,

Defendant.

Adv. Pro No. 10-04658 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN, ESQ. IN OPPOSITION TO
TRUSTEE'S MOTIONS IN LIMINE NUMBER 1 (TO ADMIT THE PLEA
ALLOCUTIONS OF BERNARD L. MADOFF AND BLMIS EMPLOYEES) AND
NUMBER 2 (TO ADMIT THE FORMER TESTIMONY OF FRANK DIPASCALI)**

I, Helen Davis Chaitman, hereby declare:

1. I am a partner with Chaitman LLP, counsel to Defendants in the above-captioned cases. I am a member of the bars of New York and New Jersey, and of this Court.

2. I submit this declaration in opposition to the Trustee's Motions *in limine* Number 1 and Number 2.

3. Attached hereto as **Exhibit A** are true and accurate excerpts from the Transcript of Deposition of Bernard L. Madoff taken April 26, 2017.

I declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct.

May 1, 2019

/s/ Helen Davis Chaitman
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